

EXHIBIT 8

PR

From: Pearl Robertson probertson@irpinolaw.com
Subject: RE: EXTERNAL-Re: Agenda items 252, 232, and 253
Date: May 30, 2020 at 4:37 PM
To: Sharon Desh Sharon.desh@bartlitbeck.com

Agree.

From: Sharon Desh <Sharon.desh@bartlitbeck.com>
Sent: Saturday, May 30, 2020 5:29 PM
To: Pearl Robertson <probertson@irpinolaw.com>
Cc: Sal Badala <SBadala@napolilaw.com>
Subject: Fwd: EXTERNAL-Re: Agenda items 252, 232, and 253

Pearl,

You will not be surprised to hear that I don't appreciate this note from Mougey. It is not an accurate representation of our call and, moreover, is contrary to the productive dialogue I feel we have finally been able to reach. To my knowledge Peter was not even on the call we had, so I don't know why he felt the need (or felt he had the knowledge) to send this email.

I will restrain myself from responding to the list serve, as I think we all know to take these emails with a grain of salt. In the future, however, I would appreciate Plaintiffs trying to work amongst themselves to be respectful of the agreements we have made. It is notes like this that make cooperation hard, but I know we are all trying - and will try to do better.

Thanks,

Sharon

BartlitBeck LLP

Sharon Desh | P: 312.494.4445 | C: 301.537.9638 | Sharon.Desh@BartlitBeck.com | 54 West Hubbard Street, Suite 300, Chicago, IL 60654

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Begin forwarded message:

From: Peter Mougey <pmougey@levinlaw.com>
Subject: EXTERNAL-Re: Agenda items 252, 232, and 253
Date: May 30, 2020 at 4:00:45 PM CDT
To: David Cohen <David@SpecialMaster.Law>, David Cohen <david@davidrcohen.com>, "xALLDEFENDANTS-MDL2804-Service@arnoldporter.com" <xALLDEFENDANTS-MDL2804-Service@arnoldporter.com>

External E-mail

I don't mean to be Debbie Downer on a Saturday Morning, but before congrats are in order we have only made a very small step forward. The parties have agreed to weekly calls, a renewed request for WAG to yet again review withheld documents based on previous orders etc. Please stay tuned for the year-old WAG min-series re its 16k docs withheld on its PL and whether we there is change in pace and scope.

Peter

From: 2804 Discovery, MDL
[<mdl2804discovery@motleyrice.com>](mailto:mdl2804discovery@motleyrice.com)
Sent: Friday, May 29, 2020 1:30 PM
To: MDL 2804 <MDL2804@motleyrice.com>
Subject: FW: EXTERNAL-Re: Agenda items 252, 232, and 253

CAUTION: This email message is
EXTERNAL.

From: David R. Cohen (David@SpecialMaster.Law)
[<david@specialmaster.law>](mailto:david@specialmaster.law)
Sent: Friday, May 29, 2020 6:22:48 PM
To: Sharon Desh <Sharon.desh@bartlitbeck.com>
Cc: Pearl Robertson <probertson@irpinolaw.com>; 2804
Discovery, MDL <mdl2804discovery@motleyrice.com>; EXT
Track1BDefendants <EXT_Track1BDefendants@jonesday.com>
Subject: EXTERNAL-Re: Agenda items 252, 232, and 253

Congratulations and thanks, have a nice weekend.
-d

=====

This email sent from:
David R. Cohen Co. LPA
24400 Chagrin Blvd., Suite 300
Cleveland, OH 44122
216-831-0001 tel
866-357-3535 fax
www.SpecialMaster.law

From: Sharon Desh <Sharon.desh@bartlitbeck.com>
Sent: Friday, May 29, 2020 2:14 PM
To: David R. Cohen (David@SpecialMaster.Law)
[<david@specialmaster.law>](mailto:david@specialmaster.law)
Cc: Pearl Robertson <probertson@irpinolaw.com>; 2804

Discovery, MDL <mdl2804discovery@motleyrice.com>; EXT Track1BDefendants <EXT_Track1BDefendants@jonesday.com>
Subject: Agenda items 252, 232, and 253

Special Master Cohen,

By means of an update, the parties have resolved agenda items 252, 232, and 253 regarding outstanding privilege challenges.

Each party reserves the right to raise good faith requests to the other regarding redactions once the downgrades are produced.

Thank you and have a nice weekend,

Sharon

BartlitBeck LLP

Sharon Desh | P: 312.494.4445 | C:
301.537.9638 | Sharon.Desh@BartlitBeck.com | 54 West Hubbard Street, Suite 300, Chicago, IL 60654

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